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COR-13-091

Hand Delivered

Director, Air and Waste Management Division
US Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

**Re: Sumitomo Metal Mining Pogo LLC (Pogo) CISWI Waste Management Plan,
40 CFR 60.2065.**

Dear Sir or Madame:

Enclosed is a Waste Management Plan for the solid waste incinerator operated by Sumitomo Metal Mining Pogo LLC (Pogo) at the Pogo Mine located near Delta Junction, Alaska. The incinerator is subject to the requirements of the Clean Air Act New Source Performance Standards (NSPS) for Commercial and Industrial Solid Waste Incineration (CISWI) units, 40 CFR Part 60, Subpart CCCC (Subpart CCCC).

Section §60.2060 requires that a Waste Management Plan be submitted prior to commencing construction. Pogo's incinerator commenced construction on December 8, 2010, prior to the effective date of the CISWI Rule. As such, Pogo was not required to develop a Waste Management Plan prior to commencing construction. To the extent it is required under these circumstances, Pogo is submitting one.

Only certain wastes are incinerated: food waste, loose-bagged household trash, Sewage Treatment Plant sludge, and oily rags. Each of these waste components is placed in clear plastic bags so that the contents are readily identifiable by the incinerator operators. In light of the need to incinerate certain non-hazardous solid waste, Pogo evaluated its existing waste management practices and developed a comprehensive program that established procedures for segregating various waste streams. The program is designed to reduce and separate components of solid waste in order to reduce or eliminate emissions from incinerated waste. The program was originally implemented in 2006.

As required by §60.2065, the program includes measures for reduction and/or separation of waste-stream elements such as paper, cardboard, plastics, glass, or metals. For example, the program requires the use of clearly marked, non-burnable waste dumpsters for separation and off-site disposal of plastics, glass, fiberglass, construction debris, large packing materials, large pieces of Styrofoam, gaskets, hoses, wiper blades, etc. These requirements also apply to used tires, air filters, brake pads, used antifreeze and motor oil, and oil filters. Recyclable wastes, including steel, copper, etc., are subject to specific procedures addressed in the plan.

Measures are included in the plan to separate and remove specific waste-components from incinerated wastes in order to reduce or eliminate emissions. These additional measures include, but are not limited to, procedures for placing aerosol cans, batteries, computer hardware, light bulbs, etc., in labeled or easily identifiable containers for which specific disposal procedures are used.

Should you have any questions, please give us a call at 907-895-2879 or email us at sally.mcleod@smpmpogo.com.

Sincerely,



Sally S. McLeod, CEM, REM
Environmental Manager

Attachment: Pogo Waste Management Table

Cc: Heather Valdez, EPA
Zach Hedgpeth, EPA
John Pavitt, EPA
Robin Wagner, ADEC
John Rosburg, AECOM
Jeff Hunter, Perkins Coie
Michael Short, SES

Pogo Mine Waste Management Table

Waste To Be Disposed	Disposal Method
Absorbents and oily rags (petroleum, oil and lubricant – no solvents)	Place in clear plastic bags, tie with red or orange flagging and place inside the RED connex in lower camp behind the incinerator for disposal. There should be NO free liquid in the bags.
Aerosol cans	Puncture can at one of the aerosol can depressurizer units [mill (ball mill lube room), lube room (by exterior warehouse door), 1525 shop, or UG inside 1875 portal]. Dispose of punctured cans as non-burnable waste in clear plastic bags. In dorms, place intact cans NEXT TO garbage can so ESS can segregate them from burnable waste.
Large Mine Equipment Air filters	Crush, contact mine supervisor, then haul to the designated paste backfill stope for disposal underground.
Antifreeze-Used Antifreeze (ethylene and propylene glycols). Please DO NOT mix red and green antifreeze because they are different wastes.	Contractors are responsible for proper off-site disposal of their used glycol. Pogo employees shall recycle it. Contact Environmental. DO NOT mix with used oil!
Incinerator Ash	Place in the “Ash Only” dumpster at lower camp.
Batteries, small (Alkaline, Lithium Ion and Ni-Cad, and small lead acid)	Place in labeled 5-gal buckets in camp, shop, admin, and mill for recycling.
Batteries, industrial (vehicle type)	Place in the labeled battery tote in front of the Mobil Maintenance shop for recycling.
Buffer solution	Neutralize with appropriate acid/base to pH 6-9 and rinse down drain with copious amounts of cold water. Discharge is included in Pogo’s APDES Permit.
Computer waste (TVs, computers, printers, toner cartridges, etc.)	Give components to IT for disposal or contact Pogo Environmental for pickup.
Contaminated soil with hydrocarbons or glycols	Contact Pogo Environmental then deliver to the Waste Storage Yard in lower camp in properly labeled DOT containers.
Contaminated snow or ice with hydrocarbons or glycols	Goes to Wash Bay.

Waste To Be Disposed	Disposal Method
Hazardous waste* -- acids, bases, insect repellent, reagents, solvents, unknown wastes, etc.	Contractors shall properly dispose of all their own hazardous waste off-site. Pogo employees shall contact Pogo Environmental and bring hazardous waste to either the containment building or Waste Yard in properly labeled DOT containers.
Light bulbs - fluorescent and compact fluorescent	Are collected by ESS and electricians then contact Pogo Environmental for drop off.
Brake Pads	Place in a non-burnable dumpster.
Loose bagged Trash (loose paper, lunch bags, food waste, wrappers, household garbage, office waste, loose packing material, Styrofoam cups and peanuts, etc.)	Loose trash goes in trash cans maintained by ESS located around site. Loose bagged trash from cans not maintained by ESS MUST BE placed inside the RED connex at the front outside KDR at upper camp for incineration. ALL food waste is incinerated onsite. DO NOT place loose trash that can blow away, food or food wrappers or containers in burnable dumpsters!
Medical/Bio-Hazard Waste	Place razors, sharps, and needles in the sharps containers at the end of hallway in the dorms. Contact the Medics for disposal of other types of Medical waste.
Non-burnable Trash (plastics, glass, fiberglass, construction debris, large packing materials, large pieces of Styrofoam, gaskets, hoses, wiper blades, etc.)	Place in the Non-burnable dumpsters. DO NOT place loose trash that can blow away, food or food wrappers or containers in the non-burnable dumpsters!
14 ounce Propane Cylinders (Benzomatic gas bottles)	Contact Environmental for disposal.
Recycle Copper (copper wiring with insulation, copper tubing)	Place in the Copper Only dumpsters.
Recycle Steel (rebar, plate steel, cut angle iron, beam scraps, banding with no plastic or wood attached, sheet metal, saw blades, etc.)	Place in the Recycle Steel dumpsters.
Used Tires*	Contractors shall dispose of all used tires off-site. Pogo employees shall place in non-burnable dumpsters.

Waste To Be Disposed	Disposal Method
<p><u>Used oil filters and used oil*</u></p>	<p>Contractors are responsible for proper off-site disposal of all their used oil and filters. Pogo oil filters shall be punctured, hot-drained and then crushed. Dispose of crushed filters and drained filters as non-burnable waste.</p> <p>Individual work groups shall transport and pump clean oil into the used oil tank in the lube room adjacent to the warehouse. Solvent contaminated oil shall be delivered to the waste yard in lower camp after contacting the Environmental Department.</p>
<p>Assay Lab Waste (crucibles, cupels and slag)</p>	<p>Contact the Environmental Department then deliver properly labeled DOT containers to the Waste Yard in lower camp.</p>

*Underlined Items are the contractors' responsibility to properly dispose of off-site.

If you are not sure where the waste goes or have any other questions, contact Pogo Environmental.

Ben Farnham at Ext. 2730

Luke Walker at Ext. 2860

Leonard Hanson at Ext. 2759

Stacy Staley at Ext. 2761

Makoto Umedera at Ext. 2853

Jim Ward at Ext. 2760

Or call us on the Surface Radio Channel